Here is a draft of the factual allegations for the **"Overt Acts in Furtherance of the Conspiracy"** section of your federal complaint.
This draft is structured to satisfy the Eleventh Circuit's strict pleading requirements for establishing personal jurisdiction over out-of-state defendants under Florida's Long-Arm Statute via the Conspiracy Theory of Personal Jurisdiction.
To overcome a 12(b)(2) motion to dismiss, your pleading must contain "clear, positive and specific" allegations detailing the in-state acts and demonstrating how those acts were performed in furtherance of the overarching scheme.

IV. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY (FLORIDA JURISDICTIONAL ANCHOR)

45. At all times relevant to this Complaint, Defendant GLEN BRADFORD ("BRADFORD") was a resident of Miami, Florida, operating within the jurisdiction of this Court.
46. The conspiracy between the out-of-state Defendants (TIMOTHY PAGLIARA, EUGENE BULSO, and BULSO PLC) and the in-state Defendant (BRADFORD) was operationalized through a continuous pattern of coordinated, tortious acts committed within the State of Florida. For the conspiracy theory of personal jurisdiction to apply, the plaintiff must successfully allege a cause of action for conspiracy among the defendants to commit a tortious act, and that any member of the conspiracy committed tortious acts in Florida in furtherance of the conspiracy.
47. The overarching purpose of this civil conspiracy was to subvert the judicial process, fabricate false jurisdictional claims in Tennessee, manufacture fraudulent defaults ("sewer service"), and employ extortionate threats of criminal prosecution to financially destroy and silence the Plaintiff, a Florida resident.
48. In furtherance of this conspiracy, Defendant BRADFORD committed the following overt, tortious acts from his residence in Florida:

A. June 2024: Coordinated Identification and Threat Escalation

49. On June 17, 2024, Defendant PAGLIARA initiated a targeted campaign against the Plaintiff's business entity, Stankonia Capital, on the social media platform X (formerly Twitter).
50. Acting in concert with and upon the direction of PAGLIARA, Defendant BRADFORD, operating from Florida, immediately engaged in cross-platform reconnaissance to expose the Plaintiff's personal identity. On June 17, 2024, BRADFORD published a post on X directed at the Plaintiff, stating: *"real777mellon on ihub = stankonia,"* followed by a direct warning that the Plaintiff was *"operating*

out of your wheel house" by exposing PAGLIARA's SEC violations.
51. This June 17, 2024, interaction constituted an overt act of intimidation and harassment executed from within Florida in direct support of PAGLIARA's campaign to silence the Plaintiff.

B. June 2024: Advance Knowledge of Fraudulent Legal Filings
52. On June 23, 2024, the Plaintiff discovered that Defendant BULSO and BULSO PLC had intentionally mailed a fraudulent complaint and summons via FedEx to a defunct Registered Agent address in Arizona, bypassing the Plaintiff's actual Florida residence—a tactic known as "sewer service."
53. On June 25, 2024, Defendant BRADFORD, operating from Florida, published a post on the Investorshub message board demonstrating detailed, advance, and insider knowledge of the Defendants' legal strategy. BRADFORD explicitly forecasted the intended outcome of the unserved lawsuit, threatening the Plaintiff with total financial ruin: *"My thought here is that the end result of this is that you will lose, if you have money, you will lose whatever that is to settle this or whatever. If you do not, you will have to file bankruptcy... Would probably bankrupt me. Would wipe out 10 years of my hard work."*
54. BRADFORD further confirmed the intentional nature of the legal malfeasance, stating: *"I do not think this is a mistake on the part of Pagliara and his law firm. I think this mistake belongs to you."*
55. BRADFORD's June 25, 2024, posts constitute overt acts in furtherance of the conspiracy, utilizing insider knowledge provided by the out-of-state co-conspirators to inflict emotional distress and amplify the coercive leverage of the fraudulent lawsuit from within Florida.

C. June 2026: Coordinated Execution of Extortionate Criminal Contempt
56. On June 4, 2026, Defendant BULSO filed a 41-page fraudulent petition for criminal contempt in Tennessee, falsely alleging that the Plaintiff had committed 21 acts of criminal impersonation utilizing the X account @timpagliara.
57. The @timpagliara account was not operated by the Plaintiff.
58. On the exact same day, June 4, 2026, acting in synchronized coordination with the Nashville legal filing, Defendant BRADFORD, operating from Florida via his X account @DoNotLose, publicly threatened the Plaintiff with *"Jail Time and Subpoenas."*
59. This synchronized out-of-court threat, published simultaneously with the filing of the fraudulent criminal contempt petition, constitutes a direct, overt act of extortion and abuse of process executed by BRADFORD from within Florida to further the conspiracy's goal of coercing the Plaintiff under the threat of fabricated

criminal incarceration.

60. The overt, tortious acts committed by Defendant BRADFORD were performed within the State of Florida. Under Florida's long-arm statute, specifically Section 48.193(1)(a)(2), a state court can exercise personal jurisdiction over a nonresident defendant for any cause of action arising from the commission of a tortious act within the state. By operation of Florida law regarding civil conspiracy, the in-state tortious acts of Defendant BRADFORD are legally imputed to the out-of-state co-conspirators, subjecting Defendants PAGLIARA, BULSO, and BULSO PLC to specific personal jurisdiction in this Court. Under the conspiracy theory of personal jurisdiction, acts of a co-conspirator performed in a forum state in furtherance of a conspiracy create sufficient minimum contacts to establish personal jurisdiction over a remote co-conspirator, even when that co-conspirator had no other direct contacts with the forum state.